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January 2, 2014

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VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Universal Service High-Cost Filing Deadlines;
Petition of Virgin Islands Telephone Corp. d/b/a Innovative Telephone for
Waiver of the National Exchange Carrier Association Adjustment Period,
WC Docket 08-71, CC Docket No. 96-45*

Dear Ms. Dortch:

Pursuant to the November 19, 2013 Public Notice issued by the Wireline Competition Bureau in the above-referenced proceedings, the Virgin Islands Telephone Corp. d/b/a Innovative Telephone ("Innovative") respectfully confirms its intent to pursue its request for a waiver of the National Exchange Carrier Association's ("NECA") rolling 24-month adjustment period. As set forth in Innovative's petition, good cause exists to grant the requested waiver because otherwise the company's 2011 High Cost Loop Support ("HCLS") would be determined based on inaccurate data and Innovative would be denied the ability to recover the full amount of support for which it is otherwise eligible under the Commission's rules.

When it filed the waiver petition, Innovative was concerned that the miscalculation of its 2011 HCLS would have ongoing adverse financial consequences by virtue of this erroneous amount being included in the baseline frozen support it would receive under the *USF/ICC Transformation Order*.¹ However, this turned out not to be the case. Consistent with the FCC's rules, USAC calculated Innovative's frozen support based on the amount disbursed as of January 31, 2012, while USAC's adjustment to Innovative's 2011 HCLS was not disbursed until February 2012. See 47 C.F.R. § 54.312(a).

¹ *Connect America Fund*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663, ¶¶ 441-442 (2011) ("*USF/ICC Transformation Order*"), *pets. for review pending sub nom. In re: FCC 11-161*, No. 11-9900 (10th Cir. filed Dec. 8, 2011).



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Nonetheless, the financial impact to Innovative associated with the calculation of the company's 2011 HCLS is significant. Specifically, unless the Commission waives NECA's rolling 24-month adjustment period, Innovative will lose \$565,860 in HCLS for 2011 – a loss that would negatively impact Innovative's operations.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced dockets.

Sincerely,

A handwritten signature in black ink, appearing to be "Bennett L. Ross", with a long horizontal line extending to the right.

Bennett L. Ross

cc: Christopher Cook
Abdel Eqab
Charles Tyler